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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VENTURES TRUST 2013-I-H-R BY MCM
CAPITAL PARTNERS LLC,

Plaintiff,

v.

SATICOY BAY LLC SERIES 4683
AMERTRINE, a Nevada Corporation, VILLAS
AT BLUE DIAMOND SPRINGS
ASSOCIATION, a Nevada Non-profit
Corporation, LEVY MILAGROS, an individual,
DOES INDIVIDUAL I through X; and ROE
CORPORATIONS XI-XX

Defendants.

Case No. 2:15-cv-01773-JAD-CWH

**STIPULATION FOR ENTRY OF
ORDER PURSUANT TO 15 U.S.C.
§1681b(a)(1) TO DIRECT DISCLOSURE
OF CREDIT REPORTS**

COMES VENTURES TRUST 2013-I-H-R BY MCM CAPITAL PARTNERS LLC,
(hereinafter “Ventures”) on the one hand by and through their counsel of record Thomas N.
Beckom, Esq of the law firm of McCarthy & Holthus LLP; SATICOY BAY LLC SERIES 4683
AMERTRINE by and through their counsel of record Michael F. Bohn, Esq of the Law Offices of
Michael F. Bohn, Esq Ltd and VILLAS AT BLUE DIAMOND SPRINGS ASSOCIATION
(“HOA”) by and through their counsel of record David T. Gluth, Esq of the law firm of the Law
Offices of Gordon & Rees LLP and hereby file this Stipulation for an Entry of Order to Disclose
the Consumer Credit Reports of Levy Milagros.

RECITALS

1. On or about May 26, 2015; Villas at Blue Diamond Springs Community Association foreclosed on real property commonly known as 4683 Ametrine Court, Las Vegas, NV 89139 (“Subject Property”).
2. At that time the property was owned by Levy Milagros and Levy Milagros was obligated on a Deed of Trust owned by Ventures.
3. In Venture’s Complaint, Ventures alleged *inter alia* that the HOA foreclosure sale was a voidable transfer pursuant to NRS §112.190(1).
4. One of the elements of a claim under NRS §112.190(1) is that Milagros must be insolvent, either via cash flow actually insolvent.
5. Ventures is desirous to Subpoena Equifax, Transunion, and Experian for a Credit Report on or about the time of the HOA foreclosure to investigate Milagros’ solvency.
6. Yet pursuant to 15 U.S.C. §1681b; Ventures is unable to obtain a credit report from Equifax, Transunion, or Experience without a Court order. 15 U.S.C. §1681b(a)(1).
7. The HOA is not objecting to Venture’s request and is not making any representation on the propriety of the requested order.
8. As such the parties hereby stipulate for the entry of a Court order ordering Equifax, Transunion, and Experian to disclose Levy Milagros’ credit report pursuant to 15 U.S.C. §1681b(a)(1).

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STIPULATION

The parties therefore hereby **STIPULATE** to the entry of an order directing the following:

1. That Transunion LLC whose Nevada Address is c/o CSC Services of Nevada Inc 2215-B Renaissance Dr., Las Vegas, NV 89119 must disclose the credit reports of Levy Milagros whose former address was 4683 Ametrine Court, Las Vegas, NV 89139 for the calendar year of 2015;
2. That Experian Information Solutions, Inc whose Nevada Address is c/o The Corporation Trust Company of Nevada 701 S. Carson St. Suite 200 Carson, City, Nevada 89701 must disclose the credit reports of Levy Milagros whose former address was 4683 Ametrine Court, Las Vegas, NV 89139 for the calendar year of 2015;

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3. That Equifax, Inc whose Nevada Address is c/o Prentice-Hall Corporation System, Nevada ,Inc 2215-B Renaissance Dr., Las Vegas, NV 89119 must disclose the credit reports of Levy Milagros whose former address was 4683 Ametrine Court, Las Vegas, NV 89139 for the calendar year of 2015;

DATED this 27th day of April, 2016

GORDON & REES, LLP

/s/ David Gluth
David Gluth, Esq
Nevada Bar No. 10596
3770 Howard Hughes Pkwy.
Las Vegas, NV 89169
Attorney for *Villas at Blue Diamonds Springs HOA*

DATED this 27th day of April, 2016

McCARTHY & HOLTHUS, LLP

/s/ Thomas N. Beckom, Esq
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Nevada Bar No. 7171
Thomas N. Beckom, Esq
Nevada Bar No. 12554
9510 West Sahara Avenue, Suite200
Las Vegas, Nevada 89117
Attorney for the Venture Trust

DATED this 27th day of April, 2016

LAW OFFICES OF MICHAEL F. BOHN, LTD

/s/ Michael F. Bohn, Esq
Michael F. Bohn, Esq
Nevada Bar No. 1641
376 E. Warm Springs Rd. Suite 140
Las Vegas, NV 89119
Attorney for *Saticoy Bay*

IT IS SO ORDERED

DATED this 3rd day of May, 2016


UNITED STATES MAGISTRATE JUDGE